

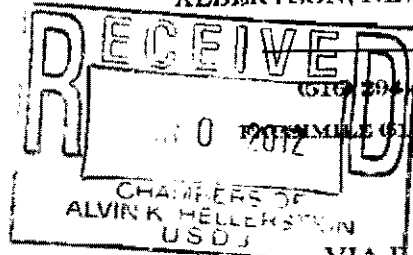
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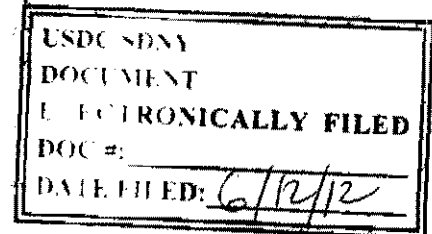
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June 6, 2012

VIA FAX TRANSMISSION
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Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, N.Y.

Re: World Trade Center Litigation
21 mc 102 and 21 mc 103



Dear Judge Hellerstein:

This office represents Hillmann Environmental Group, LLC in the above litigation. I am writing in connection with the scheduling of depositions.

Hillmann is a named defendant in hundreds of cases involving Hillmann's work at four buildings, 140 West Street (Verizon), One Liberty Plaza, 22 Cortlandt and 2 World Financial Center. Hillmann was already deposed regarding 22 Cortlandt and we have scheduled dates for Verizon and One Liberty. We have been working with plaintiff's counsel to schedule a date for 2 World Financial Center.

Due to the number of depositions scheduled as well as work commitments and personal commitments, it is impossible to arrange a date that is acceptable for all concerned within the court deadline of August 3, 2012. We are asking that we be permitted to produce our witness on a mutually convenient date of August 9 or 10. We have discussed this matter with both Bob Grochow and Greg Cannata and they do not oppose this request. We note that while these dates are beyond the August 3rd cut off, they are before the next scheduled court conference of August 15th. No prior application has been made for the relief requested herein.

Thank you for your consideration herein.

Respectfully submitted,

[Signature]
Salvatore J. Calabrese
SJC/ib
cc:
R. Grochow
G. Cannata
Via fax 212 233-6500

*Verdict, a/out prejudicial
to submission pursuant to
Indiv. Rule 2 E
6-12-12
[Signature]*